

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA

v.

NEERAJ JINDAL (1)

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NO. 4:20-CR-00358-ALM

**DEFENDANT JINDAL’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT**

Defendant Neeraj Jindal respectfully requests a two-week extension of time to and including September 6, 2022, to file his objections to the Presentence Investigation Report filed on July 28, 2022 (Doc. 145) (the “Presentence Report”). In support of this motion, Mr. Jindal states as follows:

1. Mr. Jindal was charged with participating in an antitrust conspiracy, in violation of 15 U.S.C. § 1; conspiracy to obstruct proceedings before the Federal Trade Commission (“FTC”), in violation of 18 U.S.C. § 371; and obstruction of proceedings before the FTC, in violation of 18 U.S.C. § 1505.

2. On April 14, 2022, following eight days of trial, the jury returned a guilty verdict against Mr. Jindal on Count Three, obstruction of proceedings before the FTC. The jury returned not guilty verdicts on the remaining counts.

3. Following the verdicts, the Court continued the terms of Mr. Jindal’s pretrial release, with which Mr. Jindal continues to comply.

4. On July 28, 2022, the United States Probation Office filed its Presentence Report.

5. Pursuant to General Order 14-7, Mr. Jindal’s deadline to file any objections to the Presentence Report is currently August 22, 2022.

6. Mr. Jindal and his counsel require additional time to properly review the Presentence Report and adequately brief the factual and legal issues in Mr. Jindal's anticipated objections to the Presentence Report.

7. Mr. Jindal therefore respectfully requests that the Court grant a two-week extension of time until September 6, 2022 to file any objections to the Presentence Report.

8. Notably, Counsel for the Government has indicated that the United States is not opposed to the requested extension of time.

For the foregoing reasons, Mr. Jindal respectfully requests that the Court enter an Order extending his time to file objections to the Presentence Report to and including September 6, 2022.

Dated: August 16, 2022

Respectfully submitted,

/s/ Paul E. Coggins

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**ATTORNEYS FOR
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CERTIFICATE OF CONFERENCE

I hereby certify, pursuant to E.D. Tex. Crim. L.R. 47(a)(3), that I conferred by email with Jariel Rendell, counsel for the United States, and confirmed that the United States does not oppose the relief sought in this Motion.

/s/ Jennifer M. McCoy

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been filed electronically and a copy served on all counsel of record who have consented to electronic service via the Court's CM/ECF system on this 16th day of August 2022.

/s/Paul E. Coggins

Paul E. Coggins